# For Professional Clients BNY EMEA Order Execution Policy List of Execution Venues

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V2.3



### 1. Introduction

In accordance with regulatory requirements set out in Markets in Financial Instruments Directive 2014/65/EU, the Markets in Financial Instruments Regulation 600/2014, the Commission Delegated Regulation (EU) 2017/565 and the relevant implementing measures and regulatory guidance in each of the relevant EEA member states (referred to collectively as "**MiFID II**"), all EEA BNY entities listed below ("**BNY**, "we" or "us") are required to make public in relation to BNY's Order Execution Policy a list of the execution venues on which BNY places significant reliance. All references to MiFID II within this document shall be interpreted to include UK legislation which implements, amends or replaces Directive 2014/65/EU and Regulation 600/2014 pursuant to the European Union (Withdrawal) Act 2018 (as amended) (the "EUWA") or as otherwise adopted under, or given effect to in, UK legislation or the UK regulatory regime through the FCA Rules.

This List of Execution Venues to BNY's Order Execution Policy covers the following BNY legal entities:

- The Bank of New York Mellon, London Branch;
- The Bank of New York Mellon (International) Limited;
- The Bank of New York Mellon SA/NV;
- The Bank of New York Mellon SA/NV, Dublin Branch;
- The Bank of New York Mellon SA/NV, Frankfurt Branch;
- The Bank of New York Mellon SA/NV, Amsterdam Branch; and
- The Bank of New York Mellon SA/NV, Luxembourg Branch.

The list of execution venues in this document is non-exhaustive but comprises only the venues on which BNY places significant reliance. This list will be kept under review by BNY and updated in the event there is a material change to the list of venues on which BNY places significant reliance.

# 2. Fixed Income (Bonds & Money Market Instruments) Brokerage Services Execution Venues

# **Multilateral trading facilities**

- BBG MTF UK
- BBG MTF EU
- Tradeweb UK
- Tradeweb EU

## 3. FX Execution Venues

- The Bank of New York Mellon
- The Bank of New York Mellon, SA/NV

# 4. Agency Cash Collateral Reinvestment and Agency Investment Product Execution Venues

For Cash Collateral Reinvestment and Agency Investment Product BNY will execute transactions in one of the following ways:

- Bloomberg
- Trade Web
- Tradition
- MarketAxess
- GLMX
- OTC

If you require any information in regards to the counterparties BNY transacts with when dealing on an OTC basis please consult Workbench or contact your BNY relationship manager.

# 5. Agency Securities Lending Execution Venues

Trades in the securities lending market are primarily agreed bilaterally between parties and not traded or executed on a recognized exchange.

For securities lending BNY will execute transactions in one of the following ways:

- (i) OTC Orders are negotiated with a counterparty (the "borrower") with whom we have entered into an agreement for processing orders on an agency basis;
- (ii) The following venues provide a common platform for the negotiation and processing of securing lending transactions:
  - Equilend / Bondlend
  - LoanNet
  - GLMX
  - WeMatch

If you require any information in regards to the borrowers BNY uses, please contact your BNY relationship manager.

### **About BNY**

BNY is a global financial services company that helps make money work for the world - managing it, moving it and keeping it safe. For more than 240 years BNY has partnered alongside clients, putting its expertise and platforms to work to help them achieve their ambitions. Today BNY helps over 90% of Fortune 100 companies and nearly all the top 100 banks globally to access the money they need. BNY supports governments in funding local projects and works with over 90% of the top 100 pension plans to safeguard investments for millions of individuals, and so much more. As of March 31, 2025, BNY oversees \$53.1 trillion in assets under custody and/or administration and \$2.0 trillion in assets under management.

BNY is the corporate brand of The Bank of New York Mellon Corporation (NYSE: BK). Headquartered in New York City, BNY employs over 50,000 people globally and has been named among Fortune's World's Most Admired Companies and Fast Company's Best Workplaces for Innovators. Additional information is available on www.bny.com. Follow on LinkedIn or visit the BNY Newsroom for the latest company news.